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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SHOSH YONAY and YUVAL  
YONAY,

Plaintiffs,

v.

PARAMOUNT PICTURES  
CORPORATION, a Delaware  
corporation, and DOES 1-10,

Defendants.

Case No. 2:22-CV-03846-PA-GJS

**[PROPOSED] ORDER**

District Judge: Hon. Percy Anderson  
Magistrate Judge: Hon. Gail J. Standish

**[PROPOSED] ORDER**

On July 24, 2023, Defendant Paramount Pictures Corporation (“PPC”) filed a Motion to Compel (“Motion”) pursuant to Federal Rule of Civil Procedure 37. ECF No. 40. The Parties met and conferred on August 1, 2023, and reached a compromise agreement regarding the Motion, as reflected in the Parties’ August 2, Joint Stipulation, ECF No. 43, with this Order resolving PPC’s Motion. Good cause appearing therefor, the Court hereby **ORDERS** as follows:

**PPC’s Requests for Production.**

1. In response to PPC’s Request for Production Nos. 1-35 and 43-49, Plaintiffs shall produce all non-privileged responsive documents identified through a reasonably diligent search.
2. In response to PPC’s Request for Production Nos. 36 and 42, Plaintiffs shall produce any resumes, curriculum vitae, biographies, or other documents summarizing or characterizing Ehud Yonay’s profession, work, or publications identified through a reasonably diligent search.
3. In response to PPC’s Request for Production No. 37, Plaintiffs shall produce any published works authored by Ehud Yonay (except that Plaintiffs need not produce *Top Guns* and *No Margin for Error*, as PPC already has a copy of these two works authored by Ehud Yonay) identified through a reasonably diligent search.
4. In response to PPC’s Request for Production No. 41, Plaintiffs shall produce documents constituting any speeches and lectures by, interviews of, or promotional materials about Ehud Yonay that relate to his work, professional life, or works that he authored identified through a reasonably diligent search.
5. In response to PPC’s Request for Production Nos. 38-40, the Parties shall continue to meet and confer. If the Parties are unable to reach agreement, the Parties shall file a joint status report with the Court on

1 or before August 11, 2023 that summarizes the Parties' respective  
2 positions in no more than one page per party. The Court shall rule on  
3 these requests thereafter, unless the Court requests argument.

4 6. Plaintiffs shall complete their production of documents, including  
5 service of any privilege log, on or before August 21, 2023.

6 **Interrogatories.**

7 7. Plaintiffs shall amend their responses to PPC's Interrogatory Nos. 1-4  
8 to provide substantive answers in compliance with Rule 33 based on  
9 information known by them and/or their counsel on or before August  
10 21, 2023.

11 **Requests for Admission.**

12 8. Plaintiffs shall amend their responses to PPC's Requests for  
13 Admission to admit or deny each request in compliance with Rule 36  
14 based on information known or readily obtainable by them and/or their  
15 counsel on or before August 21, 2023.

16 For the avoidance of doubt, in light of the above, Plaintiffs need not oppose  
17 PPC's Motion.

18 ***IT IS SO ORDERED.***

19 Dated: \_\_\_\_\_

20 \_\_\_\_\_  
21 Hon. Gail J. Standish  
22 United States Magistrate Judge  
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